

Frank A. Scanga, Esq. (FS 1460)
477 Madison Avenue
21st Floor
New York, New York 10022
(212) 758-4040

Attorney for Defendant:
233 Broadway Owners LLC

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE: WORLD TRADE CENTER LOWER
MANHATTAN DISASTER SITE LITIGATION

-----X 21 MC 102(AKH)

FLORA B. DAVILA,

Plaintiff(s),

07CV4463 (AKH)

-against-

NOTICE OF ADOPTION OF
ANSWER TO MASTER
COMPLAINT

1221 AVENUE HOLDINGS, LLC. et al.

Defendant(s).

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PLEASE TAKE NOTICE that Defendant, **233 BROADWAY OWNERS LLC** (hereinafter referred to as "233 BROADWAY") by it's attorney, Frank A. Scanga, Esq., as and for their response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) related to the Master Complaint filed in the above-referenced action, hereby adopts it's Answer to the Master Complaint dated, filed and served October 5, 2007, which was filed in the matter of *In Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH). The responses to all of the allegations in the Master Complaint are adopted herein and are applicable to the Check-Off Complaint served and filed herein.

PLEASE TAKE FURTHER NOTICE that defendant, 233 BROADWAY, reserves the right to serve and file an amended answer and specifically reserves the right to interpose a cross-

claim against any and all co-defendants.

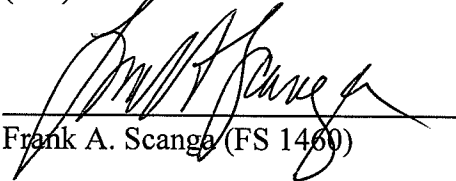
PLEASE TAKE FURTHER NOTICE that defendant, 233 BROADWAY, also adopts all affirmative defenses and the jury demand herein.

WHEREFORE, the defendant, 233 BROADWAY demands judgment dismissing the above-captioned actions as against it together with it's costs and disbursements and for such other and further relief as this Court deems just and proper.

Dated: New York, New York
October 5, 2007

FRANK A. SCANGA, ESQ.
Attorney for Defendants,
233 Broadway Owners LLC
477 Madison Avenue
21st Floor
New York, New York 10022
(212) 758-4040

By:


Frank A. Scanga (FS 1460)

To: Worby Groner Edelman & Napoli Bern
115 Broadway, 12th Floor
New York, NY 10006
(212) 267-3700

Robert A. Grochow, Esq.
233 Broadway, 5th Floor
New York, New York 10279
(212) 608-4400

Gregory J. Cannata, Esq.
233 Broadway, 5th Floor
New York, New York 10279
(212) 553-9206

CERTIFICATE OF SERVICE

I hereby certify that a true copy of 233 Broadway Owners, LLC's Notice of Adoption was served via Federal Express on the 5th day of October, 2007 upon the following Plaintiff Liaison Counsel:

Paul Napoli, Esq.
Worby Groner Edelman & Napoli Bern LLP
115 Broadway, 12th Floor
New York, New York 10006

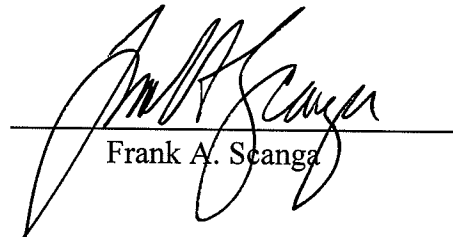
Robert A. Grochow, Esq.
Gregory J. Cannata, Esq.
Law Offices of Gregory J. Cannata
233 Broadway, 5th Floor
New York, New York 10279

and caused the documents to be electronically mailed via the internet to the following Defense Liaison Counsel:

James E. Tyrrell, Esq.
Joseph Hopkins, Esq.
Patton Boggs LLP
1 Riverfront Plaza, 6th Floor
Newark, NJ 07102

Thomas Egan, Esq.
Flemming Zulack Williamson Zauderer LLP
One Liberty Plaza
New York, NY 10006

All Defense Counsel


Frank A. Scanga